



***National  
Environmental  
Achievement Track***

***Application Form***

Spicer Heavy Systems Assembly Division, Lugoff SC

Name of facility

Dana Corporation

Name of parent company (if any)

1235 Commerce Drive

Street address

Street address (continued)

Lugoff, SC 29078

City/State/Zip code

Give us information about your contact person for the  
National Environmental Achievement Track Program.

Name Carrie Nguyen

Title Safety Coordinator

Phone (803) 438-7122

Fax (803) 438-7146

E-mail [Carrie.Nguyen@dana.com](mailto:Carrie.Nguyen@dana.com)

***Why do we need this information?***

EPA needs background information on your facility to evaluate your application.

***What do you need to do?***

- Provide background information on your facility.
- Identify your environmental requirements.

# Section A

*Tell us about your facility.*

- 1 What do you do or make at your facility? We assemble Class 8 heavy truck chassis
- 2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility. SIC  
3711  
NAICS
- 3 Does your company meet the Small Business Administration definition of a small business for your sector? ☐ Yes ☒ No
- 4 How many employees (full-time equivalents) currently work at your facility? ☐ Fewer than 50  
☐ 50-99  
☒ 100-499  
☐ 500-1,000  
☐ More than 1,000

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

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6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right *or* enclose a completed Checklist with your application.

AIR POLLUTION REGULATIONS:

1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
2. Permits & regulations of Air Pollution Sources
3. Sampling, Testing & Reporting
4. Visible Emissions Standards

HAZARDOUS WASTE MANAGEMENT REGULATIONS

1. Identification & Listing of Hazardous Waste (40 CFR 261)
  - Characteristic Waste
  - Listed Waste
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
  - Manifesting
  - Pre-transport requirements
  - Record keeping/reporting

HAZARDOUS MATERIALS MANAGEMENT

1. Designation of Reportable Quantities & Notification of Hazardous Materials Spill (40 CFR 302)
2. Worker Right-to-Know Regulations (29 CFR 1910.1200)
3. Community Right-to-Know Regulations (40 CFR 350-372)

WATER POLLUTION CONTROL REQUIREMENTS

1. Oil Spill Prevention Control & Countermeasures (SPCC) (40 CFR 112)
2. NPDES Permit Requirements (40 CFR 122)
3. Permit Monitoring/Reporting Requirements

7 Check the appropriate box in the right-hand column.

☒ I've listed the requirements above.

☐ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

We are ISO-14001 certified.

***Why do we need this information?***

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

***What do you need to do?***

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

# Section B

*Tell us about your EMS.*

1 Check *yes* if your EMS meets the requirements for each element below as defined in the instructions.

*a.* Environmental policy ☒ Yes

*b.* Planning ☒ Yes

*c.* Implementation and operation ☒ Yes

*d.* Checking and corrective action ☒ Yes

*e.* Management review ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

☐ Self-assessment

If yes, what method of EMS assessment did you use?

☐ GEMI ☐ Other

☐ CEMP

☒ Third-party assessment

☒ ISO 14001 Certification

☐ Other

### *Why do we need this information?*

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

## Section C

*Tell us about your past achievements and future commitments.*

### *What do you need to do?*

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

**Note to small facilities:** If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

### *First aspect you've selected*

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Increase the amount of paper stock to be recycled	21.06	tons	13.17	tons
<p>i. How is the current level an improvement over the previous level?</p> <p>In 1998, we recycled 21.06 tons of paperstock. In 1999, we recycled 27.12 tons of paperstock and this current year we are on track to exceed the 27.12 tons of paperstock that we recycled in 1999.</p> <p>ii. How did you achieve this improvement?</p> <p>Made employees aware of the importance of recycling their paper</p>				



*Second aspect you've selected*

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Reducing the amount of 6 Volt batteries	6	6 volt	0	6 volt
<p>i. How is the current level an improvement over the previous level?</p> <p>We have decreased the amount of batteries from six 6-Volt batteries to none at present</p>				
<p>ii. How did you achieve this improvement?</p> <p>We found alternatives to using the 6-Volt batteries by replacing our use of golf carts with roll carts for in the maintenance department.</p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

*First aspect you've selected*

- a. What is the aspect? Reducing the amount of trash going to the landfill
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to ☒ Option A:

state this as an absolute value or in terms of units of production or output.	Absolute value	1202.25 tons (Quantity/Units)
	<input type="checkbox"/> Option B: In terms of units of production or output	(Quantity/Units)
d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.	<input checked="" type="checkbox"/> Option A: Absolute value	50% (Quantity/Units)
	<input type="checkbox"/> Option B: In terms of units of production or output	(Quantity/Units)
e. How will you achieve this improvement?	We are looking at options to recycle the material instead of sending it to the landfill. Our plastic is being analyzed to see if it can be recycled instead of being sent to the landfill.	

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*Second aspect you've selected*

a. What is the aspect?	Reducing the amount of AAA, AA, 9-volt & D battery usage	
b. Is this aspect identified as significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.	<input checked="" type="checkbox"/> Option A: Absolute value	1502 batteries (Quantity/Units)
	<input type="checkbox"/> Option B: In terms of units of production or output	(Quantity/Units)
d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.	<input checked="" type="checkbox"/> Option A: Absolute value	Reduce by 10% (Quantity/Units)
	<input type="checkbox"/> Option B: In terms of units of production or output	(Quantity/Units)

e. How will you achieve this improvement?

Arrange a meeting with our battery supplier to make sure that we are not receiving batteries that have been on the shelf for a long time reducing their shelf life. We are also exploring alternative for AAA, AA, 9-volts and D batteries like we did with the 6-Volt batteries.

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### *Third aspect you've selected*

- a. What is the aspect? Recycle fluorescent light tubes
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A: Absolute value (Quantity/Units)
- ☒ Option B: In terms of units of production or output 2100 fluorescent bulbs (Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value Recycling 100% of fluorescent light tubes (Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)
- e. How will you achieve this improvement? A work instruction has been written for the maintenance department to follow in removal fluorescent light bulbs. Only the maintenance department and the transporter of the fluorescent light will be handling them before the recycling center.
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### *Fourth aspect you've selected*

- a. What is the aspect? Scrap metal slugs
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value 1750.35 tons (Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:  
Absolute value      Decreasing the amount of scrap by 20%  
(Quantity/Units)
- ☐ Option B:  
In terms of  
units of production  
or output      (Quantity/Units)

e. How will you achieve this improvement?

We will be changing from a contour rail to a straight siderail. The part numbers as well as rail lengths will be converted to match our new supplier.

# Section D

*Tell us about your public outreach and reporting.*

## ***Why do we need this information?***

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

## ***What do you need to do?***

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

Our Human Resource Manager receives, documents and responds to all communication requests from external interested parties regarding our environmental aspects and the environmental management system.

2 How do you inform community members of important matters that affect them?

We use the local newspaper to inform community members of matters that affect them.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☐ Website [www.](http://www.)

☒ Newspaper

☐ Open Houses

☐ Other

- 4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	Kershaw County Chamber of Commerce	Walter Clark	803-432-2525
<i>State/Local Regulator</i>	Dept. of Health & Environmental Control Waterree District	Reginald Watts	803-778-6548
<i>Other community/local reference</i>	Mancor, SC		803-438-6845

On behalf of  
Dana Corporation Spicer Heavy Systems  
Assembly Division, Lugoff SC

# Section E

*Application and  
Participation Statement.*

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date *Kenneth D. Jackowski* 9/26/00

Printed Name/Title *KENNETH D. JACKOWSKI DIRECTOR OF QUALITY*



Facility Name Dana Corporation Spicer Heavy Systems Assembly Division, Lugoff SC

Facility Street Address 1235 Commerce Drive  
Lugoff SC 29078

Facility ID Numbers